

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE**

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**In re:**

**Shepherds Hill Development Co., LLC,**

**Chapter 11**

**Bankr. Case No. 99-11087-MAF**

**Debtor**

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**CHAPTER 11 TRUSTEE'S LIMITED OBJECTION  
TO SHEPHERDS HILL HOMEOWNERS ASSOCIATION, INC.'S  
MOTION FOR DETERMINATION**

*NOW COMES* Edmond J. Ford, former Chapter 11 Trustee and disbursing agent (the “Disbursing Agent”) regarding the above-captioned matter by his attorneys Ford, McDonald, McPartlin & Borden, P.A., and submits his limited objection to Shepherds Hill Homeowners Association, Inc.’s Motion for Determination, and says as follows:

1. The Disbursing Agent agrees with the core point of the Homeowners Association’s motion, which is that the Plan provides the estate with no right to payment if the Homeowners Association amends its condominium documents in a fashion to add units for the reason that such an amendment is not the exercise of the Reorganized Debtor’s rights to so amend.

2. The Disbursing Agent objects to any declaration that the plan obligations have been satisfied. By the Disbursing Agent’s calculations, there are four units for which the plan provides payment which payment has not been received. The Disbursing Agent is working on confirming whether there are four units that are unresolved.

**WHEREFORE**, the Disbursing Agent respectfully requests that this Honorable Court order and decree as follows:

- A. That the Court not enter any order that the Plan Obligations have been satisfied;
- B. That the Court may otherwise enter the relief requested by the Homeowners Association if appropriate; and
- C. Grant such other and further relief as may be just.

Respectfully submitted,  
EDMOND J. FORD  
DISBURSING AGENT AND  
FORMER CHAPTER 11 TRUSTEE,

By His Attorneys,  
FORD, MCDONALD, MCPARTLIN &  
BORDEN, P.A.

Dated: May 11, 2021

By: /s/ Edmond J. Ford  
Edmond J. Ford (BNH 01217)  
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### **CERTIFICATE OF SERVICE**

I hereby certify that on May 11, 2021 I filed the foregoing via the Court's CM/ECF electronic filing system ("CM/ECF") which sent notice to all parties receiving notification through CM/ECF.

Dated: May 11, 2021

/s/ Edmond J. Ford  
Edmond J. Ford (BNH 01217)  
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